

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANGIE WANG, individually and on behalf of all
others similarly situated, and the general public,

Plaintiff,

v.

IBM CORPORATION, its predecessors,
successors and/or assigns,

Defendants.

Case No.: C 07-04914 CW

CLASS ACTION

**JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE**

JOINT STIPULATION

WHEREAS, the Court has scheduled an initial case management conference for Tuesday, January 8, 2008 at 2:00 p.m.;

WHEREAS, counsel have met and conferred regarding initial disclosures, the ADR process selection, and discovery plan;

WHEREAS, important threshold factual issues are unclear and the parties have agreed to proceed with informal discovery to clarify those issues;

WHEREAS, the clarification of those issues will determine the scope of the litigation and will likely determine what motions each side will file and the timing of those motions;

WHEREAS, the parties anticipate the clarification of these important threshold factual issues will take a number of months;

WHEREAS, counsel filed a Stipulation and [Proposed] Order on December 5, 2007, stating that they would conduct private mediation by March 26, 2008; and

WHEREAS, the parties are otherwise working diligently to move the case forward,

IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES as follows:

1. The initial case management conference currently set for Tuesday, January 8, 2008 at 2:00 p.m. shall be continued to Tuesday, February 26, 2008 at 2:00 p.m.

Dated: December 12, 2007

Respectfully submitted,

/s/ James M. Finberg .

James M. Finberg

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Attorneys for the Defendants

[PROPOSED] ORDER

Pursuant to the Stipulation above, and good cause appearing, the initial case management conference currently set for Tuesday, January 8, 2008 at 2:00 p.m. shall be continued to Tuesday, February 26, 2008 at 2:00 p.m.

IT IS SO ORDERED.

Dated: _____

The Hon. Claudia Wilken
United States District Court Judge